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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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Magalie Salas, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

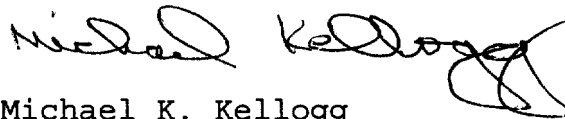
In re Matter of the Pay Telephone Reclassification
and Compensation Provisions of the Telecommunications
Act of 1996, CC Docket No. 96-128

Dear Ms. Salas:

Enclosed for filing in this docket are the original and one copy of a letter to Len Sawicki of MCI Telecommunications. I sent this letter to Mr. Sawicki today on behalf of the LEC ANI Coalition. I also sent a copy of the letter to Glenn Reynolds, counsel to the Bureau Chief in the Common Carrier Bureau. I would ask that you include the letter in the record of this proceeding in compliance with 47 C.F.R. § 1.1206(a)(2).

If you have any questions concerning this matter, please contact me at (202) 326-7902.

Yours sincerely,


Michael K. Kellogg

Enclosure

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. Len Sawicki
Director, FCC Affairs
MCI Telecommunications Corporation
1801 Pennsylvania Avenue, NW
Washington, D.C. 20006

Dear Len:

I appreciated the opportunity to meet with you last week on FLEX ANI issues. I am confident that the LECs and the IXC's can work out a mutually agreeable way for IXC's to order FLEX ANI that will minimize the burden on the IXC's while at the same time ensuring that the LECs receive all the information they require in order to process the orders in an accurate and timely fashion.

At the outset, let me emphasize that the LEC ANI Coalition members -- Ameritech, Bell Atlantic, BellSouth, GTE, SBC, SNET and U S WEST -- will provide FLEX ANI without charge if it is used for purposes of complying with the per-call compensation requirements of the Commission's payphone orders. Several Coalition members already have revised their tariffs to make this clear, and the other members will do so in accordance with the schedule established by the Commission. See Memorandum Opinion and Order, Implementation of the Pay Telephone and Reclassification Provisions of the Telecommunications Act of 1996 ¶¶ 34-DA 98-481 (CCB, March 9, 1998). Furthermore, there will be no administrative charges imposed on IXC's as part of the ordering process.

KELLOGG, HUBER, HANSEN, TODD & EVANS, P.L.L.C.

Mr. Len Sawicki

March 13, 1998

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The Coalition members also will make every effort to simplify the service order request process in order to reduce the burden on the IXCs of requesting FLEX ANI. As you know, the traditional way for IXCs to order such services is to fill out an industry-standard Access Service Request (ASR) form for each CIC code and for each end office -- designated by a Common Language Location Identifier (CLLI) code -- or trunk group in question. We recognize, however, that requiring such multiple ASRs in this instance would prove burdensome upon the IXCs.

Accordingly, I understand that Ameritech, Bell Atlantic, BellSouth and SNET have already implemented a streamlined ordering process for FLEX ANI that will allow you to order it with a single ASR per LATA (or per State) for each of your CIC codes. The other companies -- GTE, SBC, and U S WEST -- are evaluating the adoption of similarly streamlined procedures.

Because each company has unique operations support systems, it is not possible to identify a single service request format that could be processed by every company. But each member of the LEC Coalition has established, or is working hard to establish, streamlined procedures that are compatible with the methods and procedures of its IXC Service Center and that will minimize any burden on the IXCs.

I hope that you find that the process runs smoothly, and I ask you to keep me informed if any problems do develop so that I can intervene to propose an appropriate solution.

Yours sincerely,

A handwritten signature in dark ink, appearing to read "Michael Kellogg", with a stylized, cursive script.

Michael Kellogg

cc: Glenn Reynolds